



UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, D.C. 20549

DIVISION OF
CORPORATION FINANCE

July 11, 2019

Martin Cheung
Chief Financial Officer
China Zenix Auto International Ltd
No. 1608, North Circle Road State Highway
Zhangzhou, Fujian Province 363000
People's Republic of China

Re: China Zenix Auto International Ltd
Form 20-F for the Year Ended December 31, 2018
Filed April 26, 2019
File No. 001-35154

Dear Mr. Cheung:

We have completed our review of your filing. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Sincerely,

Division of Corporation Finance
Office of Transportation and Leisure